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AUTHOR Plato, Kathleen C.
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ABSTRACT

The evaluation of federal programs such as the migrant education program causes a dilemma for state education agencies. The law places the prime responsibility for establishing, and accounting for, quality programs on state and local education agencies. However, no explicit directive requires that this be done in a uniform manner. A lack of national level data on the services rendered has resulted. This paper discusses the factors which have delayed the formation of an evaluation and reporting system for the Education Consolidation Improvement Act (ECIA) Migrant Education program. The available alternatives for future data collection and reporting are discussed. A national reporting system must balance the identification of data collection limit requirements as identified by law, and the description of the unique migrant education program characteristics. (DWH)

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State Education Agency Perspective on ECIA Chapter 1 Migrant Education Program Evaluation

Kathleen C. Plato

Supervisor, Testing and Evaluation Unit
Superintendent of Public Instruction
Olympia, WA

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State education agency personnel face a dilemma in the evaluation of federal programs such as the migrant education program. There is a need for national-level data to describe services and account for program dollars yet budget cutting measures and policy shifts currently have slowed efforts to accomplish this. States are in an awkward position. While the law places the prime responsibility for establishing and accounting for quality programs on state and local education agencies, it contains no explicit directive that requires that this be done in a uniform manner. The result is a lack of national level data on the services rendered by the 264 million dollar program at a crucial budgetary period.

This paper further reviews migrant education program evaluation and reporting issues from the state agency perspective. Two central questions are addressed: What factors have delayed the formation of an evaluation and reporting system for the ECIA Migrant Education program? What alternatives are available for the years ahead?

If a national reporting system, or a periodic report on program services is a desired end, two perspectives must be balanced. These are (1) the identification of minimum and maximum data collection requirements as identified by law, and (2) description of the unique migrant education program characteristics that have made the migrant education program evaluation a challenge to date.

Current Federal Requirements

Federal law places the prime responsibility for establishing quality programs and accounting for program funds on local and the state education agencies. Two section of the law detail evaluation and reporting requirements for Chapter 1 programs:

Chapter 1, Section 556(a) of the "Educational Consolidation and Improvement Act of 1981"[1] states that "A local educational agency (LEA) may receive a grant under this chapter for any fiscal year if it has on file with the state educational agency (SEA) an application which describes the programs and projects to be conducted. . ." The section also lists the assurances that must be made by the LEA to the SEA in regard to eligibility of children, performance of a needs assessment, parent involvement, and evaluation of program effectiveness.

Section 556(b) further states ". . . that the local education agency will keep such records and provide such information to the state education agency as may be required for fiscal audit and program evaluation." Evaluation designs or models are not specified, however, both LEAs and SEAs must assure that programs ". . . be evaluated in terms of their effectiveness in achieving the goals set for them and that such evaluation shall include objective measurements of educational achievement in basic skills and determination of whether improved performance is sustained over a period of more than one year." The law requires LEAs to conduct an evaluation that uses objective measures of educational achievement, however, it permits SEA discretion in matters concerning evaluation models.

On December 8, 1983, the Technical Amendments to ECIA Chapter 1[2] added additional and reporting requirements. Section 1(b), Section 555, amends Chapter 1 by adding:

"(e) Evaluation.-- Each State Educational Agency Shall --

> "(1) conduct an evaluation of the programs assisted under this chapter at least every two years and shall make public the results of that evaluation; and
>
> "(2) collect data on the race, age, and gender of children served by the programs assisted under this chapter and on the number of children served by grade level under the programs assisted under this chapter."

The requirements imposed by both of these laws are minimal: (1) States must provide data on children served, (2) The service figures must be cross-tabulated with the variables "race," "age," "gender," and "grade," and (3) the SEA must evaluate once every two years. Items (1) and (2) require the reporting of descriptive data. Item (3) suggests a qualitative review process. Specific models for evaluation have not been identified.

The education policy reforms of 1982 were a major step in reducing the complexity and the paper work involved in federal funding. Another consequence of the "new federalism" was that program evaluation measures devised in the 1970s (such as the Title I Evaluation and Reporting System) were deleted from federal program regulations for the Education Consolidation and Improvement Act.

When specific requests were made to amend the language to require LEA evaluation data to be recorded in a common standard of measurement to allow data to be aggregated the federal response as listed in the published commentary was as follows:

"By establishing evaluation standards the Secretary would be limiting authority afforded to SEAs and LEAs under Chapter 1, thereby reducing flexibility in a manner inconsistent with the purposes of Chapter 1. There is nothing to prevent SEAs however, from adopting a common standard of measurement in order to allow data to be aggregated by state and nationally." [3]

Anyone involved in large scale data collection efforts will recognize that it is virtually impossible to accomplish such a task without a supporting organization, a project coordinator, long-term advance planning, data processing capabilities, and funding to cover staff time, and report production.

There are then two policy-related reasons for lack of a national data base or aggregated achievement data on migrant education programs. First, states have not been required to collect uniform data or evaluate using one model and second, resources have not been available for state initiated efforts along these lines.

Program Considerations

Another very different set of reasons for lack of national level data on the migrant education program stem from the nature of the program itself. A challenge is posed to anyone attempting to describe, define, categorize, and count the diverse array of services offered to highly mobile disadvantaged children through this program. What are the program characteristics that complicate data collection and evaluation of the migrant education program? What factors must be addressed in future attempts to produce national level data? The first four points listed below relate to the reporting of descriptive data, the last four address evaluation issues.

Migrant Education regulations allow state-level projects. Unlike Chapter 1 Regular, which is "flow through" funding, Chapter 1 Migrant permits special state and inter-state projects. A wide range of educational and support services are provided that are not delivered through the LEA system. Data produced by these projects are not always equivalent to LEA data and usually a separate data reporting system has been authorized. For example, a non-profit organization may be authorized to provide preschool services to migrant children, however, the superintendent of the school district in which those students reside may not know the numbers served by that grantee.

To get a full picture of migrant education programs the reporting systems and special projects in each state should be reviewed. The LEA program services represent only a portion of legitimate program expenditures of the migrant education program. If national data are used for budget reviews, the services of the total program should be reported.

Uniform definition of service have not been developed or adopted. Migrant education program services are varied. Some of the types of allowable services offered by migrant education include reading, math, language arts, oral language development, health screenings, dental services, transportation referrals, high school course completion programs, and dropout programs. To capture the service rendered for the federal dollar, each type of allowable service need to be acknowledged and clear distinctions need to be made among instructional and support service and each should be categorized and accounted for separately. Thus far, a uniform set of definitions describing types of service has not been developed. Questions related to the amount of service per child in terms of duplicated and unduplicated counts, also have not been resolved.

The timeframe for data collection has not been defined. Migrant education projects operate on many different time frames. A 1982 review of state reports prepared for the National Association of State Directors of Migrant Education (NASDME) showed fiscal year, school year, calendar year, project year, and undefined service delivery time frames are used. Some states operate programs that cover the regular (September through June) school year; some states host only summer programs. There are programs that operate the full year, and others that exist only during major impaction periods. It is impossible to accurately account for dollars when counts of participants are based on varying periods of service.

Migrant education programs vary according to the migrant labor flow. The type and timing of various harvests and the availability of work determine a worker's length of stay in an area. The number of eligible children varies by month. Some states have larger settled-out populations, and operate year-long programs. Other states such as Florida, Texas, Ohio, and North Carolina show extreme variations from minimum to maximum enrollments as student populations swell during peak harvest times.

Coastal states such as Louisiana, Mississippi, Alaska, and Washington have the largest number of children of migrant fishers. The school attendance pattern of these children varies from agricultural migrants. School districts generally adapt program operation and staffing to fit these different needs.

There are few state programs that are alike. The NASDME National Profile of Programs for Migrant Children's Education[4] identified several variables that affect state program design. These include:

- o Percentage mobile vs. settled out.
- o Extensiveness of intrastate migration.
- o Number and type of harvests.
- o Number eligible by status.
- o Percentage eligible vs. percentage served over time.

Designs must be established that capture services in relation to these variations and impaction periods.

Migrant education programs are supplemental. The programs are designed to be implemented in conjunction with other operating basic and compensatory education programs. It is highly improbably that a technique can be applied that will isolate gain solely from the

supplementary program. The TIERS models measure gains over and above those acquired through regular classroom instruction, but how is this affected when children receive multiple program services--basic education, Chapter 1 Regular, and migrant education tutoring?

English is usually a second language for migrant children. One of the program's major emphases is oral language development. A program evaluation effort should take into account two factors. First, the student's ability to take a test written in English, and second, how do models used to measure language-acquisition programs differ from models used to measure the achievement of a ESL child in a specific subject matter area.

Student mobility will affect evaluation model choice and period of peak migration. It almost goes without saying. The target population for whom service is prioritizes, the status I, II, IV, and V child, is the group least likely to be available for program evaluation testing. This especially holds for those models requiring two test scores from the same test battery at different times of the year.

The review of state reports, the production of the National Profile, and current work by the Task Force on Migrant Program Evaluation, have shown that a variety of approaches are being used at the state level to fulfill the requirement to evaluate. The five most commonly used methods include (1) The Title I evaluation models (TIERS), (2) pre-post designs without adherence to TIERS assumptions and guidelines, (3) state assessment models -- all children tested

with migrant students designated as a subgroup. Testing time, and sometimes test, defined by state law. (4) "Point-in-time" assessment, only migrant children tested. Testing time decided by program staff to optimize number of migrant children. (5) Criterion-referenced testing.

Each of these approaches can be used under different circumstances and produce different types of data. For the most part, the data cannot be aggregated to produce a national report on migrant student achievement. At best, data from states using TIERS could be aggregated, but the resulting data would be far from representative.

Future Directions

What efforts have been made toward addressing these complex issues? What are reasonable alternative directions for the future from the state point-of-view?

1. The RTI Study[5] was an extensive (and expensive) federally funded study of migrant children and the migrant education program. The 4.2 million dollar study produced 57 specialized reports. An unfortunate series of events led to the public release of very limited, biased information about the migrant education program from this report. The news articles were written **without** the benefit of RTI's full discussion of the issues, or their statements conveying the limitations of the data. In addition, many of the study's findings of a positive nature were overlooked. The contributions of the study should be acknowledged and serve as the starting point of a new review. Similarly, the NASDME Evaluation Committee report "A Response to the RTI Study" should be viewed to counterpoint some of the controversial findings from the program perspective.

2. Choice of "evaluation" model for the migrant education programs should continue to be a state prerogative. State policies regarding data collection and program evaluation differ greatly. Currently, several states draw evaluation data for the migrant program from other established data collection systems, such as state testing programs, or Chapter 1 Regular testing. The effects on established state practices should be considered. The effort to identify, describe, and promote the use of appropriate models being conducted by the USDE TAC Task Force on Migrant Education should be supported.

3. The development of a standardized reporting format for ECIA Migrant Education Program should be a state and federal venture. The proposed form for 1986 reporting is controversial and takes a significant departure from the format established for Chapter 1 Regular programs. The design for the collection of service data used in review of the cost effectiveness of the program should take into account the program considerations listed here.

4. Considerable advance time is needed to produce uniform data, if a standard state reporting system is to become operational. In fairness, school districts must be given notice in August or September as to the requirements for end-of-year

reporting at the close of that school year. The SEA usually has six months to check and process LEA reports and report to the federal offices by February of the following year. Given optimum conditions (i.e., all reports received on time, quality control checks favorable) federal officials would need a minimum of six months to process state reports. At minimum, the evaluation design, definition of terms, form, directions, and procedures should be made available to states two years prior to estimate of the due date of the federal report.

It may be that given the current law, state policies, state program variations, and the technical difficulties of capturing achievement gain on a very mobile population will prohibit a national report of migrant education program effectiveness through the traditional state reporting route. A specially funded national study may be the answer. The constraints of the law and state policy, the tremendous management task, program idiosyncrasies, and the technical problems with the currently available models will continue to pose problems. Defining and acknowledging those concerns, however, is the first step in overcoming them.

NOTES

[1]Omnibus Budget Reconciliation Act. Public Law 97-35, Subtitle D, Elementary Consolidation and Improvement Act: 1981.

[2]Public Law 98-21 Technical Amendments to the Education Consolidation and Improvement Act of 1981 approved December 9, 1983.

[3]Federal Register, Volume 47, Number 24. November 19, 1982.

[4]Plato, Kathleen C., Program for Migrant Children's Education, National Association of State Director's of Migrant Education, December, 1984.

[5]Cameron, Ben, Comprehensive Summary: Study of the ESEA Title I Migrant Education Program, Research Triangle Institute, March, 1981.